

### **REMARKS**

Claims 5-11 have been canceled and new claims 12 - 27 have been added. Accordingly, claims 12 - 27 are pending in the application and are presented for examination in view of the foregoing amendments and following remarks.

The Office Action of December 23, 2004 has been reviewed and the comments therein carefully considered. In the outstanding Office Action claims 5, 6, and 11 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,254,531 to Higuchi et al. in view of U.S. Patent No. 5,471,242 to Kondo; and claims 7 - 10 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Higuchi et al., Kondo, and further in view of U.S. Patent Publication No. 2003/0147634 to Takezawa et al.

By this Amendment claims 5 - 11 are canceled and claims 12 - 27 are added. The features of new claims 12 - 27 are supported by the embodiments described in the specification, beginning on page 23, line 32. .

It is therefore respectfully submitted that the above amendments introduce no new matter within the meaning of 35 U.S.C. § 132.

### **Rejection under 35 U.S.C. § 103**

The Examiner rejected claims 5, 6, and 11 as being unpatentable over Higuchi et al. in view of Kondo; and rejected claims 7 - 10 as being unpatentable over Higuchi et al., Kondo, and further in view of Takezawa et al. As amended, Applicants respectfully traverse these rejections.

To establish a *prima facie* case of obviousness, the Examiner must establish: (1) that some suggestion or motivation to modify the references exists; (2) a reasonable expectation of success; and

(3) that the prior art references teach or suggest all the claim limitations. Amgen, Inc. v. Chugai Pharm. Co., 18 USPQ2d 1016, 1023 (Fed. Cir. 1991); In re Fine, 5 USPQ2d 1596, 1598 (Fed. Cir. 1988); In re Wilson, 165 USPQ 494, 496 (C.C.P.A. 1970).

It is respectfully submitted that the combination of references fails to teach or suggest all the limitations as set forth in independent claims 12, 16, 20, and 24.

The feature of the present invention is as follows. Specifically, a moving-picture pickup unit picks up a moving picture and outputs a first moving-picture signal having a first horizontal pixel density (non-tetragonal lattice), and a storage unit stores a still picture having a second horizontal pixel density (tetragonal lattice). A first horizontal pixel density conversion unit reads out the still picture from the storage unit and converts the second horizontal pixel density (tetragonal lattice) thereof into the first horizontal pixel density (non-tetragonal lattice). A picture synthesis unit synthesizes the first moving-picture signal (or the second moving-picture signal) and the still picture converted to have the first horizontal pixel density (non-tetragonal lattice). A second horizontal pixel density conversion unit converts the first horizontal pixel density (non-tetragonal lattice) of the synthesized picture into the second horizontal pixel density (tetragonal lattice), and a write control unit writes the synthesized picture into the storage unit. See, for example, Figures 5 and 6.

As described above, according to the present invention, a still picture such as a title picture formatted as a JPEG file is reproduced from a memory and is synthesized with a picked up picture, and accordingly the synthesized picture can be written and stored again into the memory.

As discussed in the previous response by Applicants, Higuchi et al. discloses an electronic-endoscope light quantity controlling apparatus for supplying light to a light guide arranged in a

scope. On page 5 of the Office Action, the Examiner states that Higuchi et al. fails to teach explicitly that the iris-mechanism can be used as a mechanical shutter in the still image mode. The Examiner cites Kondo in an attempt to cure the deficiencies of Higuchi et al.

Kondo teaches a still image pickup apparatus with shortened exposure time. In Kondo, the arrangement enables the exposure time to be set at a length of time shorter than a length of time necessary for a light-shielding action of a light-shielding means. A half-opening type shutter (an iris shutter) serves as a shutter and as an iris diaphragm for adjusting the quantity of incident light. See column 4, paragraph beginning on line 10.

On page 6 of the Office Action, the Examiner states that the combination of Higuchi et al. and Kondo fails to teach explicitly a first picture-display format converter that decreases a horizontal pixel density of the still-picture frame image...to convert the first picture-display format thereof into a second picture-display format... The Examiner cites Takezawa et al. in an attempt to cure the deficiencies of the other two references.

Takezawa et al. teaches a signal processing apparatus, control method for signal processing apparatus, imaging apparatus recording/reproducing apparatus. In paragraph [0012], image data of various different image data are handled in keeping with increased resolution of image data, to execute processing efficiently. In paragraph [0130], the image of the object and the title information is displayed in real-time on the finder 36.

However, Applicants respectfully submit that Higuchi et al. and Kondo are not relevant to new claims 12- 27 of the present invention. Particularly, Higuchi et al. and Kondo fail to disclose the features of the conversion unit and the picture synthesis unit as recited in the independent claims.

Instead, Higuchi et al. merely discloses controlling the quantity of light and Kondo merely teaches controlling exposure time.

Therefore, Applicants respectfully submit that the differences between Takezawa et al. and the present invention is the only issue. Therefore, Takezawa et al. and the present invention will be compared and examined hereinunder.

Paragraph [0130] in Takezawa et al. discloses that the resolution conversion circuit 28 converts the XGA format of the image data (see paragraph [0128]) into the VGA format. Since the XGA format and the VGA format are each known as a tetragonal lattice, the resolution conversion circuit 28 performs a conversion from a tetragonal lattice into a different tetragonal lattice.

Further, paragraph [0107] in Takezawa et al. discloses a conversion of the number of pixels by the NTSC/PAL converter. This conversion is a conversion from a tetragonal lattice into a non-tetragonal lattice.

Consequently, Takezawa et al. fails to teach or suggest a conversion from a second horizontal picture density into a first horizontal picture density as in claims 12 and 20 of the present invention, a conversion from a tetragonal lattice into non-tetragonal lattice as in claims 16 and 24 of the present invention, . Further, Takezawa et al. fails to teach or suggest a picture synthesis unit that synthesizes one of the first moving-picture signal (or the second moving-picture signal) and the still picture converted to have the first horizontal pixel density (non-tetragonal lattice) and in independent claims 12, 16, 20, and 24. Furthermore, Takezawa et al. fails to teach or suggest that the synthesized picture is converted into a tetragonal lattice (second horizontal picture density) and then is written into a storage unit again as in independent claims 12, 16, 20, and 24 of the present invention.

From the foregoing descriptions, Applicants respectfully submit that the present claims patentably define over Higuchi et al., Kondo and Takezawa et al. taken either alone or in combination.

Moreover, as claims 13-15, 17-19, 21-23, and 25-27 each depend from one of independent claim 12, 14, 16, or 20, which are believed to be allowable, Applicants submit that these claims are also allowable.

Applicants respectfully submit that the combination of references does not teach or suggest all the limitations as recited in claims 12 - 27 of the present invention. It is therefore respectfully submitted that the rejection under 35 USC § 103(a) should be withdrawn.

### **CONCLUSION**

In light of the foregoing, Applicants submit that the application is in condition for allowance. If the Examiner believes the application is not in condition for allowance, Applicants respectfully

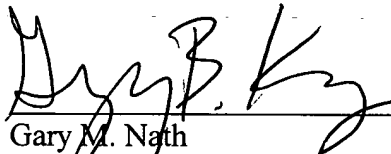
request that the Examiner contact the undersigned attorney if it is believed that such contact will expedite the prosecution of the application.

Respectfully submitted,

**NATH & ASSOCIATES PLLC**

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NATH & ASSOCIATES PLLC  
1030 Fifteenth Street, N.W.  
Sixth Floor  
Washington, DC 20005  
Tel: (202) 775-8383  
Fax: (202) 775-8396

  
\_\_\_\_\_  
Gary M. Nath  
Registration No. 26,965  
Gregory B. Kang  
Registration No. 45,273  
Teresa M. Arroyo  
Registration No. 50,015  
Customer No. 20529